

Katten

50 Rockefeller Plaza
New York, NY 10020-1605
+1.212.940.8800 tel
katten.com

BRIAN L. MULDREW
brian.muldrew@katten.com
+1.212.940.6581 direct
+1.212.894.5796 fax

VIA ECF

June 13, 2024

Honorable John P. Cronan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Factor75, LLC and Grocery Delivery E-Services USA Inc. v. Ruprecht Company, d/b/a Kilcoy Global Foods North America*, No. 24-cv-04094
Defendant's Request for Extension of Time to Respond to Complaint and to Make an Application to Maintain Seal

Dear Judge Cronan:

This firm represents Defendant Ruprecht Company d/b/a Kilcoy Global Foods North America ("Defendant") in the above-referenced action. We write pursuant to Rule 3(B) of this Court's Individual Rules to request an extension of time for Defendant to respond to Plaintiffs Factor75, LLC and Grocery Delivery E-Services USA Inc.'s (collectively, "Plaintiffs") Complaint, and for the parties to make an application to maintain the seal on the Complaint and its accompanying exhibits.

Defendant's current deadline to respond to Plaintiffs' Complaint under the Federal Rules of Civil Procedure is June 20, 2024. Additionally, the parties' deadline to make an application to maintain the seal is also June 20, 2024. Defendant requires additional time to thoroughly review the background materials that are necessary for Defendant to adequately address and respond to the allegations in the Complaint. The parties have conferred, and Plaintiffs have consented to Defendant's request for extension.

Accordingly, Defendant respectfully requests that the deadline for Defendant to move, answer, or otherwise respond to the Complaint, and the deadline for the parties to make an application to maintain the seal be extended to July 22, 2024. There have been no previous requests for extensions of time in this matter.

Respectfully,

/s/ Brian L. Muldrew
Brian L. Muldrew
Counsel for Defendant

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Cc: Charles DeVore (*pro hac vice* pending)
Counsel for Defendant

David S. Kleban
Counsel for Plaintiffs